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DAVID E. JANSSEN
Chief Administrative Officer

VIA FACSIMILIE AND ELECTRONIC MAIL

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September 22, 2004

Michael R. Peevey, President
California Public Utilities Commission
San Francisco Office, Room 5218
505 Van Ness Avenue
San Francisco, CA 94102

Dear Commissioner Peevey:

PROPOSED 310/424 AREA CODE SPLIT

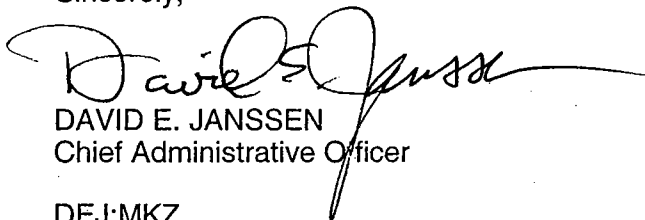
On September 21, 2004, the Los Angeles County Board of Supervisors instructed this office to submit this letter to your commission in support of the alternative opinion written by California Public Utilities Commissioner Loretta Lynch, opposing the 310 area code split at this time. The immediate implementation of a 310/424 area code split called for by the Administrative Law Judge's opinion is premature and is not built on the very successful conservation measures that the California Public Utilities Commission (CPUC) has already adopted.

The 310/424 area code split is not necessary at this time due to the following factors: (1) number pooling introduced in 2000, (2) increased contamination rate enacted in August 2003, and (3) local number portability enacted in November 2003, which has allowed for better control of the number blocks allocated to phone service carriers. In order to develop credible evidence that a split is required, your commission must have an opportunity to compile and analyze data which include recent conservation measures. The last independent audit was conducted in 2001 before any of the very successful conservation measures were implemented.

The fairest and most effective way to make an accurate estimation of the status of the life of the 310 area code is to address the numbers in the pool and to establish inventory control guidelines and include all carriers. If this action requires further waivers from the Federal Communications Commission (FCC), the CPUC has the responsibility to seek such relief.

On behalf of the County, we appreciate your serious consideration of this proposal.

Sincerely,



DAVID E. JANSSEN
Chief Administrative Officer

DEJ:MKZ
VLA:nl

c: Each Supervisor
Interim Director of Internal Services